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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
  
Plaintiff and Counter-defendant,  
  
v.  
  
SONOS, INC.,  
  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF COLE B.  
RICHTER IN SUPPORT OF SONOS,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL DOCUMENTS  
FILED IN SUPPORT OF ITS BRIEF IN  
RESPONSE TO COURT'S ORDER RE  
PATENT SHOWDOWN TRIAL**

1 I, Cole B. Richter, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Lee Sullivan Shea & Smith LLP, counsel of  
4 record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing of  
5 the Bar of the State of Illinois. I have been admitted *pro hac vice* in this matter. I make this  
6 declaration based on my personal knowledge, unless otherwise noted. If called, I can and will  
7 testify competently to the matters set forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under  
9 Seal in connection with Sonos’s Brief in Response to Court’s Order re Patent Showdown  
10 (“Sonos’s Brief”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEAL	DESIGNATING PARTY
Exhibit 4 to the Declaration of Alyssa Caridis in Support of Sonos’s Brief	Portions outlined in red boxes	Sonos

16 4. Exhibit 4 references Sonos’s confidential business information and trade secrets,  
17 including details regarding the technical operation of various Sonos products and Sonos’s  
18 research and development processes. The specifics of how these functionalities and processes  
19 operate is confidential information that Sonos does not share publicly. Thus, public disclosure of  
20 such information may lead to competitive harm as Sonos’s competitors could use these details  
21 regarding the architecture and functionality of these products to gain a competitive advantage in  
22 the marketplace with respect to their competing products. A less restrictive alternative than  
23 sealing this exhibit would not be sufficient because the information sought to be sealed is Sonos’s  
24 confidential business information and trade secrets and is integral to Sonos’s legal arguments.

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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge. Executed this 15th day of September, 2022 in Chicago, Illinois.

3  
4 /s/ Cole B. Richter

COLE B. RICHTER